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UNITED STATES DISTRICT COURT. DISTRICT COURT EASTERN DISTRICT OF WISCONSKIERN DISTRICT-WIFILED

2020 FEB 19 P 3 55

UNITED STATES OF AMERICA,

CLERK OF COURT

Plaintiff,

v.

Case No. 20-CR-[21 U.S.C. §§ 841 and 846; 18 U.S.C. §§ 2, 922(g), 924(a)(2)]

RAMONE LOCKE, aka "Mone," aka "Money Mone," JESUS PUENTES, aka "IP," MICHAEL SMITH, aka "M&M," VICTOR GONZALEZ, aka "Bey Bey," GARRELL HUGHES, aka "Rello," LAMAR JOHNSON, aka "Fresh," RICO SMITH, aka "Rico," MICHAEL WILSON, aka "Big Mike," AMIR LOCKE, aka "Mir," aka "Big Mir," JOEY VAZQUEZ, aka "Joey," COURY AGEE, aka "Lil C," aka "C-Smooth," LOUIS BATES, aka "Little Louis," TYRONE BRYANT, aka "TY," DENNIS KING, aka "Dee Dee," DERRELL TAYLOR, aka "D," LUIS LORENZO, aka "Pito," NICHOLAS WELDON, aka "Tick," DEON BUTTS, aka "Stingy," aka "Big Stingy," MAURENO BRIGGS, aka "Reno," DAWAN TURNER, aka "Big Wan,"

20-CR-041

Defendants.

JASMAINE LINTON, aka "Jas," ALFONSO GREER, aka "Goo," and JUIQUIN PINKARD, aka "Quincy,"

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Beginning in at least 2018 and continuing until on or about February 19,
 2020, in the State and Eastern District of Wisconsin and elsewhere,

RAMONE LOCKE, aka "Mone," aka "Money Mone,"

JESUS PUENTES, aka "JP,"

MICHAEL SMITH, aka "M&M,"

VICTOR GONZALEZ, aka "Bey Bey,"

GARRELL HUGHES, aka "Rello,"

LAMAR JOHNSON, aka "Fresh,"

RICO SMITH, aka "Rico,"

MICHAEL WILSON, aka "Big Mike,"

AMIR LOCKE, aka "Mir," aka "Big Mir,"

JOEY VAZQUEZ, aka "Joey,"

COURY AGEE, aka "Lil C," aka "C-Smooth,"

LOUIS BATES, aka "Little Louis,"

TYRONE BRYANT, aka "TY,"

DENNIS KING, aka "Dee Dee," and

DERRELL TAYLOR, aka "D,"

knowingly and intentionally conspired with each other and others, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. The amount of controlled substances involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to each of them, included 1 kilogram or more of a mixture and substance containing heroin, a Schedule I controlled substance; 5 kilograms or more of a mixture and substance containing cocaine, a Schedule II controlled substance; 280 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance; and more than 50 kilograms

of marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A)(i), 841(b)(1)(A)(ii), 841(b)(1)(A)(iii), and 841(b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 11, 2019, in the State and Eastern District of Wisconsin,

LOUIS BATES, aka "Little Louis,"

did knowingly and intentionally distribute a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 30, 2019, in the State and Eastern District of Wisconsin,

JOEY VAZQUEZ, aka "Joey," and TYRONE BRYANT, aka "TY,"

did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II controlled substance.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2019, in the State and Eastern District of Wisconsin,

NICHOLAS WELDON, aka "Tick,"

did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 6, 2019, in the State and Eastern District of Wisconsin,

GARRELL HUGHES, aka "Rello," and TYRONE BRYANT, aka "TY,"

did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2019, in the State and Eastern District of Wisconsin,

LAMAR JOHNSON, aka "Fresh," and DENNIS KING, aka "Dee Dee,"

did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 13, 2019, in the State and Eastern District of Wisconsin,

COURY AGEE, aka "Lil C," aka "C-Smooth,"

did knowingly and intentionally distribute a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about November 18, 2019, in the State and Eastern District of Wisconsin,

VICTOR GONZALEZ, aka "Bey Bey,"

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms which, prior to his possession of each, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

- 2. The firearms are more fully described as:
- a Smith & Wesson, model 1000, 12 gauge shotgun bearing serial number FS11493;
- a Century Arms, model Centurion 39 Sporter, 7.62mm rifle bearing serial number 39NC05110;
- a ROMARM/Cugir, model TTC, 7.62mm pistol bearing serial number DA4081953;
- a ROMARM/Cugir, model Draco NAK9, 9mm pistol bearing serial number RONVMB71814292;
- a Para-Ordnance, model P10-45, .45 caliber pistol bearing serial number QM4508;
- a Bushmaster, model Carbon 15, .223 caliber rifle bearing serial number CRB044041;
- a Smith & Wesson, model M&P 15-22, .22 caliber pistol bearing serial number DTM9353;
- a Ruger, model 9C9S, 9mm pistol bearing serial number 329-32356;
- a Glock, model 30, .45 caliber pistol bearing serial number WZB202;
- a Masterpiece Arms, model MPA30, 9mm pistol bearing serial number FX09544;
- a Smith & Wesson, model 13, .357 caliber revolver bearing serial number 6D05246;
- a DPMS, model A15, .223 caliber pistol, bearing serial number F213359;
- a Ruger, model AR-556, 5.56 caliber rifle bearing serial number 854-38974;

- an ARMSCOR of the Philippines, model M1911-A1 CS, .45 caliber pistol, bearing serial number CIT038778;
- an American Derringer, model M-1, .45 caliber derringer bearing serial number 79168;
- a Glock, model 21, .45 caliber pistol bearing serial number BNX702US;
- a Hi-Point (Haskell), model JHP, .45 caliber pistol bearing serial number X4237811;
- a Galesi Arms handgun bearing serial number 429667;
- an Aero Precision, model X15, multi-caliber rifle bearing serial number USA02032;
- a ROMARM/Cugir, model WASR-10/63KR, 7.62mm rifle bearing serial number 1967AE1133;
- an Anderson Manufacturing, model AM-15, multi-caliber pistol bearing serial number 15045678;
- a Winchester, model 1300, 12 gauge shotgun bearing serial number L3158843;
- a Smith & Wesson, model M&P Shield, .45 caliber pistol bearing serial number HXF2971;
- a Glock, model 43, 9mm pistol bearing serial number BFTP117;
- a Glock model 35, .40 caliber pistol bearing serial number ZAY769;
- a Hi-Point, model 995, 9mm rifle bearing serial number F168598;
- a Llama, model Comanche, .38 caliber revolver bearing serial number 713548;
- a Glock, model 19, 9mm pistol bearing serial number XTU952;
- a Remington, model 1911 R1 S, .45 caliber pistol bearing serial number RHH067492;
- a Smith & Wesson, model M&P 15-22, .22 caliber rifle bearing serial number HCF8447;
- an A.A. Arms, model AP9, 9mm pistol bearing serial number 049042;
- a Century Arms International, model RAS 47, 7.62mm rifle bearing serial number RAS47051533;
- a Berretta, model PX4, pistol bearing serial number PY145461;
- a Titan MFG, model Titan, .25 caliber pistol bearing serial number A82251;
- a Zastava, model PAP M92 PV, 7.62mm pistol bearing serial number M92PV044769;
- a Ruger model 9E, 9mm pistol bearing serial number 337-33664; and
- a Smith & Wesson, model M&P 9, 9mm pistol bearing serial number HVK6640.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 20, 2019, in the State and Eastern District of Wisconsin,

JESUS PUENTES, aka "JP," and TYRONE BRYANT, aka "TY,"

did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance, and a mixture and substance containing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2019, in the State and Eastern District of Wisconsin,

JUIQUIN PINKARD, aka "Quincy," and MICHAEL SMITH, aka "M&M,"

did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II controlled substance.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 2, 2019, in the State and Eastern District of Wisconsin,

TYRONE BRYANT, aka "TY," and MICHAEL SMITH, aka "M&M,"

did knowingly and intentionally distribute a controlled substance.

2. The offense involved 100 grams or more of a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 11, 2019, in the State and Eastern District of Wisconsin,

RAMONE LOCKE, aka "Mone," aka "Money Mone," and DENNIS KING, aka "Dee Dee,"

did knowingly and intentionally distribute a controlled substance.

2. The offense involved 100 grams or more of a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2019, in the State and Eastern District of Wisconsin,

DEON BUTTS, aka "Stingy," aka "Big Stingy,"

did knowingly and intentionally distribute a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2019, in the State and Eastern District of Wisconsin,

AMIR LOCKE, aka "Mir," aka "Big Mir," and ALFONSO GREER, aka "Goo,"

did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II controlled substance.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 27, 2019, in the State and Eastern District of Wisconsin,

VICTOR GONZALEZ, aka "Bey Bey," and DERRELL TAYLOR, aka "D,"

did knowingly and intentionally distribute a controlled substance.

2. The offense involved 100 grams or more of a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2020, in the State and Eastern District of Wisconsin,

RICO SMITH, aka "Rico," and DENNIS KING, aka "Dee Dee,"

did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2020, in the State and Eastern District of Wisconsin,

MICHAEL WILSON, aka "Big Mike," and JASMAINE LINTON, aka "Jas,"

did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 16, 2020, in the State and Eastern District of Wisconsin,

LUIS LORENZO, aka "Pito," and DERRELL TAYLOR, aka "D,"

did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2020, in the State and Eastern District of Wisconsin,
 MAURENO BRIGGS, aka "Reno,"

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Sig Sauer 5.56mm rifle, bearing serial number 20C081683.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about January 29, 2020, in the State and Eastern District of Wisconsin,

DAWAN TURNER, aka "Big Wan," and DERRELL TAYLOR, aka "D,"

did knowingly and intentionally distribute a controlled substance.

2. The offense involved 100 grams or more of a mixture and substance containing heroin, a Schedule I controlled substance.

FORFEITURE NOTICE

- 1. Upon conviction of the controlled substance offense alleged in Counts One through Seven, Eight through Eighteen, and Count Twenty of this Indictment, the defendants shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation, including but not limited to the following:
 - a. A sum of money representing the amount of unseized proceeds obtained as a result of the offense in Count One;
 - b. The residential real property located at 3278 N. Buffum Street, Milwaukee, Wisconsin;
 - c. The residential real property located at 2826 N. Holton, Milwaukee, WI;
 - d. The residential real property located at 3041 N. 39th Street, Milwaukee, WI; and
 - e. The commercial real property located at 634 W. North Avenue, Milwaukee, WI, d/b/a Levels Nightclub.
- 2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America

shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p), including but not limited to, the following:

- a. A white 2017 Acura MDX with Wisconsin license plate AHG 4782
 and vehicle identification number 5FRYD3H36HB009000; and
- b. A white 2011 International Durastar 4300 Regular Cab truck with vehicle identification number 1HTMMAAL9BH317514.

A TRUE BILL:

FÓREPERSON

Dated: February 19, 2020

MATTHEW D. KRUEGER United States Attorney